## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

| UNITED STATES OF AMERICA | ) |                      |
|--------------------------|---|----------------------|
|                          | ) |                      |
| <b>v.</b>                | ) | Case No. 24-cr-00180 |
|                          | ) |                      |
| RYAN MACAULAY,           | ) |                      |
| Defendant                | ) |                      |

## MOTION TO TRAVEL AND TO TEMPORARILY RETURN PASSPORT

Ryan Macaulay, by and through undersigned counsel respectfully requests this Court allow Mr. Macaulay to travel internationally for work purposes and to allow the temporary return of his passport for the same.

In support of this Motion, Mr. Macaulay states the following:

- 1. On August 15, 2024, Mr. Macaulay was charged by Indictment and Superseding Indictment with Conspiracy to Commit Bank Fraud, in violation of 18 U.S.C § 1349, and related offenses. *See* Dkt. No. 1 and 38.
- 2. On April 15, 2025, Mr. Macaulay pleaded guilty to all counts in which he was charged. *See* Dkt. No. 114.
  - 3. Sentencing is currently set for September 4, 2025. See Dkt. No. 112.
- 4. Mr. Macaulay has been on pretrial supervision since August 22, 2024, has been compliant with all conditions, and has been allowed international travel for work purposes so he can maintain his livelihood during the pendency of this case.
- 5. Mr. Macaulay has traveled internationally three separate times while on pretrial supervision during the pendency of this case without issue, and wishes to continue to earn a living through the complete resolution of this case.

- 6. Mr. Macaulay requests to travel to Spain for work. Specifically, he requests to travel to Barcelona, Spain where the ship he is working on will be dropped off and then sail to Cadiz, Spain where the Navantia shipyard is and will remain throughout the rest of his time in Spain.
- 7. While in Spain, Mr. Macaulay's work requires him to work on the IT systems of the ship Carnival Valor of Carnival Cruise Lines.
- 8. Mr. Macaulay requests to leave on Wednesday, May 7, 2025, at 6:05 pm from Washington Dulles International Airport through United Airlines and arrive in Barcelona, Spain at 8:20 am on May 8, 2025.
- 9. Mr. Macaulay additionally requests to travel slightly ahead of the trip's departure to ensure any travel delays are accounted for and therefore will need to stay in a hotel in Barcelona prior to his boarding. He will stay in the Yurbban Ramblas Boutique Hotel from Thursday, May 8, 2025, to Saturday, May 10, 2025.
- 10. The ship departs Barcelona, Spain on May 10, 2025, and arrives in Cadiz, Spain on May 12, 2025, or early May 13, 2025. He would then fly home on May 28, 2025.
- 11. When flying home, Mr. Macaulay requests to depart Jerez, Spain at 9:15 am through American Airlines, arrive in Madrid, Spain at 10:35 am. He would then depart Madrid, Spain at 11:50 am and arrive at Washington Dulles International Airport at 3:00 pm.
- 12. Mr. Macaulay would require his passport be temporarily returned to him to travel internationally to Spain for this work trip.
  - 13. Counsel conferred with pretrial services, and they indicated they defer to the Court.
- 14. Counsel also conferred with the government, who indicated that they also defer to the Court and take no position.

WHEREFORE, for the forgoing reasons, Mr. Macaulay respectfully requests that this Court grant his request to travel internationally to Barcelona, Spain and Cadiz, Spain, from May 7, 2025, through May 28, 2025, and to allow his passport to be temporarily returned to him for this trip.

Respectfully submitted,

\_\_\_\_/s/\_\_\_

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of April 2025, a copy of the foregoing Motion to Travel and to Temporarily Return Passport has been served via CM/ECF upon the parties in this matter.

| /s/              |  |
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| Rammy G. Barbari |  |